

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHRISTINE BIROS,)
Plaintiff) 2:23 cv 00297
)
v.)
)
SHANNI SNYDER and others,)
Defendants.)

MOTION TO DISMISS THE AMENDED COMPLAINT

George Snyder moves to Dismiss the Amended Complaint in this matter.

I don't need to repeat and restate the arguments why this flapdoodle case should be dismissed, instead I incorporate by reference the motions to dismiss and briefs of the defendants. I see Allen Roth's brief and I incorporate that. I guess Shanni and Kash will file a brief if they didn't already. I will contact Kash and remind him. Shanni, I don't want to get blamed for conspiring so I won't call her and see what's up, but if she has some good arguments that Allen didn't cover, I incorporate them.

As for the lawsuit filing enterprise, I did not have anything to do with my parents tax case from 1988 where they claimed millions in gold was buried in Monroeville and, unfortunately, I never found that gold. I am not that George Snyder. I am George Snyder Jr. Let's be clear about that I get blamed for enough.

I know the bankruptcy judge found that I acted strangely in court, clutching the rail, so I am not credible. The judge said, "this was a different George. From the minute he took the witness stand, George awkwardly clutched the back rail as if holding on for dear life. He was visibly nervous and flushed, constantly shifting in his seat. It seemed George was testifying against his will." I was testifying against my will!!!!!! Biros issued a subpoena for my presence!!!! But the reason I was clutching is because I had severe back pain from an accident where I fell off the roof. I also was diagnosed with heart problems and told I needed open heart surgery, which I recently survived. I am not sure why the judge didn't ask me if he thought I was having a problem and having a heart attack or

something. Nobody asked me, I didn't even realize my credibility was based on that type of stuff. But it wasn't my heart condition, it was the back pain. Some days are good, some aren't. I don't know what caused the flushing, I have no idea. Might have been the circulation problem, but I didn't notice. Can't explain something I didn't know.

The statements though are consistent. I have been saying the same thing over and over and over. I said it repeatedly at the creditor meeting, in the declarations, at the hearing where BIROS subpoenaed me to attend: Shanni Snyder was not an employee on the payroll of U Lock. We didn't have employees who got paychecks, John Biros didn't want that. We had about 20 people who helped, we gave them food mostly, some cash. We didn't give Shanni cash. She watched the video, I hope she watched it a lot, I assume she paid attention. Maybe the judge is right and she didn't watch it constantly, she said she watched. I learned from this litigation that an employee doesn't need a salary to be an employee and a volunteer might be an employee, sisterly love might be an employee under the labor law. I determined after hearing all this that I was an employee to cuz I worked for 8 years, cutting grass, shoveling snow, electrical, dirt movement, and didn't get a penny for working on what I guess is Biros' land. Shanni'd have gotten more than minimum wage if we were able to develop the property, but we couldn't because John and Christine had their illegal gambling enterprise and the Attorney General of Pennsylvania was trying to find their cash stash.

U Lock defaulted on the Shanni Snyder thing. U Lock didn't have anything, so what was the point. Without developing the property, it was with just under \$1000 or so. I am not supposed to spend money for U Lock just to make Biros happy. It's not my job. I don't know if shanni's video watching was worth the \$262,000 this court awarded, but we can't pay it anyway. I'm not sure why this court doubled the money.

Then Biros is complaining in her lawsuit that we didn't file the certiorari. There wasn't no point, while the stay existed, biros snagged the deeds. Why do I have to pay to file certiorari \$300 filing fee just because I said I planned to do it. I am not sure how that creates the conspiracy, it doesn't

make sense. If I would have filed the certiorari then it'd have been delayed more, not less, so I helped Biros and she says its a conspiracy because I did her a favor. If I filed the certiorary Biros would say the certiorari was to delay her. I guess her attorneys wanted the certiorari thing filed so they could get more fees.

***IF I UNDERSTOOD BANKRUPTCY I WOULD HAVE FILED FOR U LOCK IN 2018
THEN BIROS NEVER WOULD HAVE HAD A TRIAL. I WISH SHANNI WOULD HAVE TOLD
ME HOW TO DO THAT THEN INSTEAD OF HER DOING IT IN 2022.***

In addition to the cases Allen Roth cites that suing under RICO for litigation does not state a claim, I point out other cases on point. *See, e.g., von Bulow v. von Bulow*, 657 F. Supp. 1134, 1145 (S.D.N.Y. 1987) ("a complaint based on nothing more than a party's filing of unjustified suits cannot fulfill the requirement that a RICO plaintiff plead a predicate act"); *Nakahara v. Bal*, No. 97 Civ. 2027(DLC), 1998 WL 35123, at *8 (S.D.N.Y. Jan. 30, 1998) (same); *Auburn Medical Center, Inc. v. Andrus*, 9 F. Supp. 2d 1291, 1299 (M.D. Ala. 1998) (same). As the Eighth Circuit noted in dicta, Judges and lawyers often complain that the courts are inundated with a flood of litigation, but the fact remains that litigation is as American as apple pie. *I.S. Joseph Co. v. J. Lauritzen*, 751 F.2d 265, 267-68 (8th Cir. 1984).

Conclusion

This case needs to be dismissed as not stating a claim and for being vindictively mean and flapdoodly. It's a Strategic Lawsuit Against Public Participation. It's not a proper RICO. There's no jurisdiction. It doesn't state a claim. It's FLAPDOODLE!

Respectfully submitted,

/s/ George Snyder

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